

1. Identify, by call sign and location, each Site-based Authorization that you lease or have leased from Maritime.

ANSWER: Subject to and without waiving the above general objections, PSE responds as follows:

PSE entered a Spectrum Manager Lease Agreement with Maritime on May 20, 2010. Notification of the lease was filed with the FCC on June 28, 2010, and the Notification was assigned File No. 0004299952. The Spectrum Manager Lease authorizes PSE to use spectrum licensed to Maritime under Call Sign KAE889 at Location 4 (Rainier Hill), Location 20 (Mount Constitution), Location 30 (Gold Mountain), Location 34 (Capital Peak), and Location 48 (Tiger Mountain). PSE is in the process of constructing the new Consolidated Radio System but has not yet activated any of its own radio facilities under the Spectrum Manager Lease Agreement. PSE is not leasing, using, or proposing to use any equipment or other facilities owned or controlled by Maritime.

As described above, PSE is developing a wide-area private mobile radio network that PSE will use to support internal communications among its employees. PSE's network will utilize AMTS spectrum that is being leased from Maritime and that PSE has proposed to acquire from Maritime through partial assignment of the license for KAE889, as well AMTS spectrum that PSE acquired from two other licensees, Environmental LLC and Skybridge Spectrum Foundation, through partitioning and disaggregation in FCC File Nos. 0004258631 and 0004258642, respectively. (See also PSE's Call Signs WQGF313 and WQJW654, respectively, representing the AMTS spectrum PSE acquired from Environmental LLC and Skybridge Spectrum Foundation). PSE's current design for the new private mobile radio ("PMR") network calls for approximately 57 fixed base station transmitter sites operating at relatively low power (generally less than 20 watts ERP) and deployed throughout PSE's combined electric and gas

service territory, encompassing approximately 6,000 square miles. These base stations will provide PMR service to approximately 2,000 vehicular and portable radio units used by PSE's employees and contractors for critical communications related to the construction, operation and maintenance of PSE's electric and gas utility operations. PSE will not offer radio service to the public with these facilities.

2. Describe the coverage area provided by any facility that was constructed at each location for each call sign you identified in response to Interrogatory No. 1, above.

ANSWER: Subject to and without waiving the above general objections, PSE responds as follows:

Maritime provided a map to PSE depicting Maritime's coverage from the five (5) locations on Call Sign KAE889 for which PSE has a Spectrum Manager Lease from Maritime. This map was included as Exhibit A to the Spectrum Manager Lease Agreement. PSE has no further direct knowledge or information of Maritime's coverage from those locations identified in response to Interrogatory No. 1, above.

The PMR stations being designed and constructed by PSE and that will use AMTS spectrum leased from Maritime and already acquired from Environmental LLC and Skybridge Spectrum Foundation will generally provide coverage to PSE's electric and gas operating territories, a map of which may be viewed at PSE's website at

http://pse.com/aboutpse/PseNewsroom/MediaKit/1213_service_area_map.pdf.

3. State whether there is currently a facility constructed at each location for each call sign you identified in response to Interrogatory No. 1, above.

ANSWER: Subject to and without waiving the above and general objections, PSE responds as follows:

PSE has no direct knowledge of whether there is currently a facility constructed at each of the five (5) locations on Call Sign KAE889 for which PSE has a Spectrum Manager Lease from Maritime. As described in detail in PSE's response to Interrogatory No. 13, below, PSE personnel observed Maritime facilities at each of these locations during site visits conducted between August 24, 2010, and August 26, 2010.

4. State whether a facility is currently operating (i.e., on-the-air, transmitting a signal) at each location you identified in your response to Interrogatory No. 1, above. If not, explain why not.

ANSWER: Subject to and without waiving the above and general objections, PSE responds as follows:

As described above, PSE has no direct knowledge of whether a facility is currently operating (i.e., on-the-air transmitting a signal) at each the five (5) locations on Call Sign KAE889 for which PSE has a Spectrum Manager Lease from Maritime. As described in detail in PSE's response to Interrogatory No. 13, below, PSE personnel observed Maritime facilities operating at each of these locations during site visits conducted between August 24, 2010, and August 26, 2010.

5. For each location you identified in your response to Interrogatory No. 1, above, state the date on which construction of a facility at that location was completed.

ANSWER: Subject to and without waiving the above and general objections, PSE responds as follows:

PSE has no direct knowledge of the date when construction of facilities was completed at each of the five (5) locations on Call Sign KAE889 for which PSE has a Spectrum Manager Lease from Maritime.

6. For each location you identified in your response to Interrogatory No. 1, above, state the date on which a facility at that location was placed in operation.

ANSWER: Subject to and without waiving the above and general objections, PSE responds as follows:

PSE has no direct knowledge of the date on which facilities were placed in operation at each of the five (5) locations on Call Sign KAE889 for which PSE has a Spectrum Manager Lease from Maritime.

7. State whether a facility was operating (*i.e.*, on-the-air, transmitting a signal) at each location you identified in response to Interrogatory No. 1, above, at the time you leased it from Maritime. If not, explain why not.

ANSWER: Subject to and without waiving the above and general objections, PSE responds as follows:

As stated above, PSE has no direct knowledge of whether any facilities were operating (*i.e.*, on-the-air, transmitting a signal) at each of the five (5) locations on Call Sign KAE889 for which PSE has a Spectrum Manager Lease from Maritime as of the date PSE entered the Spectrum Manager Lease with Maritime (*i.e.*, May 20, 2010). As described in detail in PSE's response to Interrogatory No. 13, below, after PSE entered the Spectrum Manager Lease with Maritime, PSE personnel observed Maritime facilities operating at each of these locations during site visits conducted between August 24, 2010, and August 26, 2010.

8. State whether a facility was constructed at each location you identified in your response to Interrogatory No. 1, above, at the time you leased it from Maritime. If not, explain why not.

ANSWER: Subject to and without waiving the above and general objections, PSE responds as follows:

As stated above, PSE has no direct knowledge of whether any facilities were constructed at each of the five (5) locations on Call Sign KAE889 for which PSE has a Spectrum Manager Lease from Maritime as of the date PSE entered the Spectrum Manager Lease with Maritime (*i.e.*, May 20, 2010). As described in detail in PSE's response to Interrogatory No. 13, below, after PSE entered the Spectrum Manager Lease with Maritime, PSE personnel observed Maritime facilities at each of these locations during site visits conducted between August 24, 2010, and August 26, 2010.

9. State whether operations at each facility constructed at each location you identified in your response to Interrogatory No. 1, above, have ever ceased. If so, explain why and describe how long any such facility at any such location was not or has not been operating.

ANSWER: Subject to and without waiving the above and general objections, PSE responds as follows:

PSE has no direct knowledge of whether or when operation of any facilities may have ceased at any of the five (5) locations on Call Sign KAE889 for which PSE has a Spectrum Manager Lease from Maritime.

10. With respect to each Site-based Authorization you identified in response to Interrogatory No. 1, above, identify each location at which a facility was not constructed in accordance with the requirements of the relevant License, including geographic coordinates, antenna heights, and other technical parameters included on the License.

ANSWER: Subject to and without waiving the above and general objections, PSE responds as follows:

PSE personnel made site visits to each of the five (5) locations on Call Sign KAE889 for which PSE has a Spectrum Manager Lease from Maritime between August 24, 2010, and August 26, 2010. As described in detail in PSE's response to Interrogatory No. 13, below, PSE observed that Maritime had facilities at these locations and observed tests conducted by Maritime personnel to verify that Maritime's transmitters were operating on authorized frequencies and power levels. Except as stated herein, PSE personnel did not observe or verify whether Maritime's facilities at these locations were or were not constructed in accordance with the requirements of the relevant License, including geographic coordinates, antenna heights, or other technical requirements included on the License.

11. With respect to any location you identified in response to Interrogatory No. 10, above, describe how the facility differs from the requirements of the relevant License, including geographic coordinates, antenna heights, and other technical parameters included on the License.

ANSWER: Subject to and without waiving the above and general objections, PSE responds as follows:

No response. PSE did not identify any locations in response to Interrogatory No. 10.

12. Describe each Communication between you (or any Representatives of yours) and Maritime referring or relating to Maritime's Site-based Authorizations, including, but not limited to, the date any such Communication(s) occurred, the names and affiliation of each individual who participated in or received any such Communication(s), and the subject matter of such Communication.

ANSWER: Subject to and without waiving the above and general objections, PSE responds as follows:

PSE objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and requests information that is not relevant to any claim raised by the Bureau. Subject to and without waiving this objection, PSE responds as follows:

Since about October 2009, representatives of PSE have had telephone and email Communications with Maritime generally relating to Maritime's Site-based Authorizations. Initial communications between PSE and Maritime were for the purpose of negotiating the purchase and lease of AMTS spectrum that is licensed to Maritime under the Site-based Authorizations in the geographic areas where PSE needs coverage from its new private land mobile radio system. Other Communications between PSE and Maritime related to the preparation and filing of applications for assignment of Maritime's Site-based Authorizations to PSE and for notification to the FCC of the Spectrum Manager Lease Agreement. More recent Communications have related to the pending FCC enforcement hearing and Maritime's bankruptcy proceeding, both of which relate to the Site-Based Authorizations.

PSE believes that the only representatives of PSE that had such Communications with Maritime are the following:

Steve Secrist (PSE)

Margaret Hopkins (PSE)

Charlie Seese (PSE)

Jiri Sykora (PSE)

Jim Lofgren (PSE)

Doug Smith (PSE)

Rich Peterson (PSE)

Charlie Morton (Consultant to PSE)

Kevin Babich (Consultant to PSE)

Jeffrey Sheldon (Outside Counsel to PSE)

PSE believes that the only representatives from Maritime with whom PSE has communicated are the following:

John Reardon (Maritime)

Tim Smith (Maritime)

Curt Brown (Outside Counsel to Maritime)

Bob Keller (Outside Counsel to Maritime)

Craig Geno (Outside Counsel to Maritime)

13. Describe each meeting which both you (or any Representative of yours) and Maritime attended referring or relating to Maritime's Site-based Authorizations, including, but not limited to, the date any such meeting(s) took place, the names and affiliation of each individual who attended the meeting, and the subject matter discussed.

ANSWER: Subject to and without waiving the above and general objections, PSE responds as follows:

Except for the site visits described below, PSE does not recall any in-person meetings between representatives of PSE and representatives of Maritime referring or relating to Maritime's Site-based Authorizations.

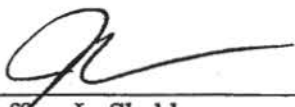
PSE personnel visited each of the five (5) locations identified in response to Interrogatory No. 1 between August 24, 2010, and August 26, 2010. The specific PSE personnel who attended these site visits were Jim Lofgren, Doug Smith, and Rich Peterson, all of whom were and are Communications Technicians with PSE. The PSE personnel were escorted into the sites by Tim Smith, Vice President of Maritime.

During these visits, PSE learned where Maritime's equipment was installed within each of the five (5) locations, and PSE personnel observed Maritime's transmitters operating at each of the five (5) locations. PSE personnel, in conjunction with Tim Smith, performed tests confirming the transmitting frequencies and output power of Maritime's transmitters. PSE personnel and Tim Smith also conducted Voltage Standing Wave Ratio ("VSWR") testing of the antenna lines at each of the five (5) locations. PSE is not aware of any documentation as to the results of the tests that were performed during these visits. PSE personnel confirmed that Maritime's facilities at each of the five (5) locations were capable of transmitting and recall that the transmitters at all of these locations were transmitting station identification information during these site visits.

14. In the event you are unable to respond to any Interrogatory above, please explain why you are unable to respond.

ANSWER: Subject to and without waiving the above and general objections, PSE responds as follows:

PSE has responded to all of the foregoing Interrogatories.



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Counsel for Puget Sound Energy, Inc.

Dated: August 29, 2012

DECLARATION

I, Charlie Seese, state that I am the Manager Telecommunications Services of Puget Sound Energy, Inc.; that I have assisted in the preparation of and have reviewed the response of Puget Sound Energy, Inc. to the Enforcement Bureau's First Set of Interrogatories to Puget Sound Energy, Inc., dated July 25, 2012, in EB Docket No. 11-71 before the Federal Communications Commission; that I am familiar with the factual matters addressed in said response; and that the factual assertions made in said response are, to the best of my knowledge, information, and belief, true and accurate, and are made in good faith.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 29 day of August, 2012.

A handwritten signature in black ink, appearing to read 'Charlie Seese', is written over a horizontal line.

Charlie Seese

CERTIFICATE OF SERVICE

I, David D. Rines, do hereby certify that on this 29th day of August, 2012, a single copy (unless otherwise noted) of the foregoing "Answers of Puget Sound Energy, Inc. to the Enforcement Bureau's First Set of Interrogatories" was delivered to the following by electronic mail and first-class mail unless otherwise indicated:

Marlene H. Dortch (hand delivery) **(ORIGINAL PLUS 6 COPIES)**
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Hon. Richard L. Sippel (e-mail only)
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Austin K. Randazzo (e-mail only)
Attorney-Advisor/Law Clerk
Office of the Administrative Law Judge, RM 1C860
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Attn: J. Stobaugh

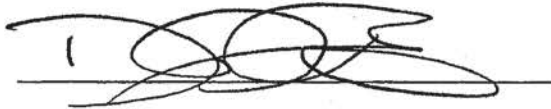
A handwritten signature in black ink, consisting of a series of loops and a horizontal line at the end, positioned above a horizontal line.

EXHIBIT 20

DECLARATION OF JOHN REARDON

I, John Reardon, am a former employee of AMTS licensee Maritime Communications/Land Mobile, LLC ("MCLM"), and before that Mobex Network Services Company, LLC ("Mobex"). Both companies at one point in time were owners of AMTS licenses under call sign WRV374 in Hamden, CT and Rehoboth, MA, now held by Maritime Communications/Land Mobile, LLC as Debtor in Possession ("MCLM DIP").

I testify that when Mobex conducted its due diligence and ultimately purchased the AMTS channels from Regionet Wireless License LLC, ("Regionet") I was involved. I recently reviewed again the lease between Regionet and LIN Television Corporation, d/b/a WTNH-TV dated April 25, 2001, for operation in Hamden at that site. That station was part of the assignment from Regionet to Mobex. I also have seen the March 19, 2001 installation invoice from PRS to Regionet in the amount of \$1,680.20 for tower installation work at the Hamden site.

In addition, I recently reviewed a lease between Regionet and Outlet Broadcasting for the Rehoboth, MA location, that lease was dated August 1, 2000 and also was signed by Regionet's owner, Mr. vander Heyden.

I testify that Mobex never abandoned these sites when it owned them. In fact, I have seen evidence of payments by Mobex to these site owners throughout the period from 2001 to 2005, including spreadsheets from Sharon Watkins the accounts payable manager, detailing these payments by Mobex to the lessors. I would regularly report to the Mobex Board about the significant amount of Mobex site lease payments, including these, and related costs of utilities, etc.

Mobex assigned these and its other site based licenses to MCLM upon closing of the asset purchase agreement with MCLM in December 2005. It was never the intention of MCLM to permanently discontinue operations from either of these two sites.

In fact, MCLM in 2009 entered new leases for the Hamden and the Rehoboth stations. I have seen an invoice dated October 26, 2010 from Northeast Towers for installation of a new antenna in Hamden, CT for the WRV374 station.

In addition, I signed the lease dated May 14, 2009 between MCLM and tower owner Clear Channel Communications for station WRV374 in Hamden, Connecticut.

Similarly, on June 3, 2009, Tim Smith signed a new lease for the Rehoboth station with Media General Operations, the site owner. I have seen a copy of that lease.

I recall speaking with Bob Salvatore of Cybercomm in Warwick, Rhode Island, within the past few weeks and being told by him that one of his employees monitored the Rehoboth site, and

that the Rehoboth site was on the air and transmitting. Similarly, I believe from conversations with both Tim Smith and Bob Meister, both of whom have recently visited the Hamden location, that the transmitter is on the air at that location. I am further informed that they fixed a routine computer problem during their visit to the Hamden site.

MCLM never abandoned or permanently discontinued the Rehoboth and Hamden sites. In addition to the above activity, MCLM has actively marketed service in these two sites, including the 2008 brokerage agreement with Spectrum Bridge, LLC to list the stations as part of its online portfolio of licenses for sale or lease, known as SpecEx. These WRV374 stations have been continuously marketed for sale or lease since that 2008 timeframe, i.e. over five years, on the SpecEx online spectrum listing, www.Specex.com.

Moreover, MCLM actively marketed the spectrum to AMTRAK and others, including the MetroNorth Rail Road and Massachusetts Bay Transportation Authority (MBTA), as well as Northeast Utilities, through their consultants for Positive Train Control or to their employees directly in charge of two way radios, PTC, and general communications. These efforts included responses to several RFPs and other negotiations with consultants, utilities, and railroad employees directly.

I have not personally visited either site.

I swear under the penalty of perjury the above information is correct to the best of my knowledge.

A handwritten signature, likely "J. M.", is written over a horizontal line. To the right of the signature, the date "9-10-13" is handwritten.

EXHIBIT 21



DECLARATION OF CYBERCOMM, INC.

I, Robert F. Killeen am an employee of Cybercomm, Inc. I visited the WJAR tower in Rehoboth, Massachusetts on August 23, 2013. Using a spectrum analyzer, I verified that the equipment for WRV374 was transmitting a signal in the AMTS (217-220 MHz) band.

I swear under the penalty of perjury the above information is correct.

Robert F Killeen

CYBER COMMUNICATIONS, INC.

90 Colorado Avenue

Warwick, RI 02888

Tel: 401.738.1470

Fax: 401.738.8695

EXHIBIT 22

DECLARATION OF ROBERT W. MEISTER

I, Robert W. Meister, residing at 104 Twin Brook Road, Hamden, Connecticut, an independent engineer, visited the tower set forth in ASR # 1216288 in Hamden, Connecticut on August 24, 2013 with Tim Smith. I have an FCC General Radiotelephone Operators License (GROL).

I unlocked the gate and provided access to the equipment shelter for Mr. Smith and myself. I witnessed Tim Smith as he measured with a wattmeter the transmitter power feeding the duplexer and also the power feeding the antenna coax. The CW ID computer was experiencing a failure when I arrived so Tim Smith replaced the computer. After the repairs we both verified that we heard the CW ID transmitting for station WRV374 on two separate receivers approximately every two minutes.

I swear under penalty of perjury the above information is correct.

W. Meister 10 Sep 13